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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONALD WALDEN JR, NATHAN
ECHEVERRIA, AARON DICUS, BRENT
EVERIST, TRAVIS ZUFELT, TIMOTHY
RIDENOUR, and DANIEL TRACY on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE STATE OF NEVADA, *EX REL.* ITS
NEVADA DEPARTMENT OF
CORRECTIONS, and DOES 1-50,

Defendants.

Case No.: 3:14-cv-00320-MMD-WGC

**COMPENDIUM OF EXHIBITS,
INCLUDING DEPOSITION
TESTIMONY, IN SUPPORT OF
PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT ON LIABILITY
FOR UNPAID WAGES UNDER THE
FLSA**

Plaintiffs, Donald Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt, Timothy Ridenour, and Daniel Tracy, hereby submit their Index and Compendium of Class Member Declarations and Deposition Testimony and Exhibits in support of Plaintiffs' Motion for Partial Summary Judgment.

EXHIBITS:

1. NDOC Administrative regulation (AR) 326, Posting of Shifts/Overtime
2. ESP Operating Procedure ("OP") 322, Posting of Shifts/Reporting for Duty
3. HDSP OP 032, Posting of Shifts/Reporting for Duty (Marked Confidential)

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- 1 4. SDCC OP 326, Posting of Shifts/Overtime
- 2 5. NNCC OP 326, Posting of Shifts/Overtime
- 3 6. FMWCC OP 326, Posting of Shifts/Overtime (Marked Confidential)
- 4 7. WSCC OP 326, Security Staffing (Marked Confidential)
- 5 8. NNCC OP 307 Pull and Shutdown Procedures (Marked Confidential)
- 6 9. Correctional Lieutenant and Correctional Sargent Class Specification
- 7 10. NDOC Payroll Procedures
- 8 11. Deposition of Hope Chowanski (Marked Confidential)
- 9 12. NDOC Administrative regulation (AR) 320 – Salary Administration
- 10 13. California Correctional Peace Officer Association Collective Bargaining Agreement
- 11 14. Christopher Newport University Peter M Carlson, Ph.D., Peter M. Carlson, Judith Simon
- 12 Garrett, Ph.D, Prison and Jail Administration: Practice and Theory

13 WARDEN DEPOSITION TESTIMONY¹:

- 14 15. Isidro Baca (Marked Confidential)
- 15 16. Renee Baker (Marked Confidential)
- 16 17. Jo Gentry (Marked Confidential)
- 17 18. Brian Williams (Marked Confidential)

18 CO DEPOSITION TESTIMONY:

- 19 19. Ray Allen (Marked Confidential)
- 20 20. Adrian Arias (Marked Confidential)
- 21 21. Carl Arnold (Marked Confidential)
- 22 22. Vironica Banks (Marked Confidential)
- 23 23. Joseph Baros (Marked Confidential)
- 24 24. Francisco Bautista (Marked Confidential)

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26 ¹ As of January 31, 2018, NDOC has requested that all deposition testimony be marked “Confidential.” Accordingly

27 and pursuant to the Court’s Protective Order, these documents have not been submitted to the Court at this time. The

28 party seeking to maintain the confidentiality of the document—i.e., NDOC—must seek an order to seal this document. See ECF No. 73, at ¶ 11 (a). Plaintiffs will file these documents, either under seal or in open court, once this Court rules on NDOC’s anticipated motion. See *Id.* (“The confidential material will not be filed until after the Court has ruled on the party’s Motion to File Documents Under Seal.”)

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- 1 25. Timothy Carlman (Marked Confidential)
- 2 26. Terry Day (Marked Confidential)
- 3 27. Aaron Dicus (Marked Confidential)
- 4 28. Nathan Echeverria (Marked Confidential)
- 5 29. Brent Everist (Marked Confidential)
- 6 30. Jason Hanski (Marked Confidential)
- 7 31. Eric Jones (Marked Confidential)
- 8 32. Paul Kluever (Marked Confidential)
- 9 33. Dariusz Krol (Marked Confidential)
- 10 34. Tony Lai (Marked Confidential)
- 11 35. Kristopher Ledingham (Marked Confidential)
- 12 36. Andre Natali (Marked Confidential)
- 13 37. Teresa Radke (Marked Confidential)
- 14 38. Timothy Ridenour (Marked Confidential)
- 15 39. Donald Riggs (Marked Confidential)
- 16 40. Daryl Rocho (Marked Confidential)
- 17 41. Jan Shultz (Marked Confidential)
- 18 42. Daniel Tracy (Marked Confidential)
- 19 43. Terry Tremblay (Marked Confidential)
- 20 44. Joel Tynning (Marked Confidential)
- 21 45. Kirk Valdez (Marked Confidential)
- 22 46. Donald Walden (Marked Confidential)
- 23 47. Travis Zufelt (Marked Confidential)
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- 28

1 Dated this 24st day of February 2020.

THIERMAN BUCK LLP

3 /s/ Joshua D. Buck

4 Mark R. Thierman, NV Bar No. 8285

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